

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOREEN GREENWOOD,

Plaintiff,

NOTICE OF MOTION

-against-

CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF PARKS AND RECREATION;
ADRIAN BENEPE, as Commissioner of the NEW
YORK CITY DEPARTMENT OF PARKS AND
RECREATION; JOSEPH TRIMBLE, as Director of
Timekeeping, Payroll, Benefits, and Labor Relations,
of the NEW YORK CITY DEPARTMENT OF PARKS
AND RECREATION; RAYMOND KELLY, as
Commissioner of the NEW YORK POLICE
DEPARTMENT; and ANDREW LUNETTA, as
Commanding Officer of the License Division of the
NEW YORK POLICE DEPARTMENT,

08 Civ. 4474 (GBD)

Defendants.


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PLEASE TAKE NOTICE, that upon the Declaration of Doreen Greenwood, dated September 3, 2008, the Declaration of Stuart Lichten, dated September 4, 2008, the accompanying Memorandum of Law, and upon all of the prior pleadings and proceedings in this action, plaintiff Doreen Greenwood shall move this Court, before the Honorable George Daniels, at a time and date to be set by the Court, at 500 Pearl Street, New York, New York, pursuant to

Rule 56 of the Federal Rules of Civil Procedure, for an Order granting summary judgment on liability to plaintiff, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
September 4, 2008

SCHWARTZ, LICHTEN & BRIGHT, P.C.

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